

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	)	Chapter 11
	)	
FIRST GUARANTY MORTGAGE	)	Case No. 22-10584 (CTG)
CORPORATION, <i>et al.</i> , <sup>1</sup>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	<b>Related to Docket Nos. 5, 61</b>

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**NOTICE OF FILING OF PROPOSED FINAL ORDER GRANTING MOTION OF THE  
DEBTORS FOR ENTRY OF INTERIM AND FINAL ORDERS: (I) AUTHORIZING USE  
OF CASH MANAGEMENT PROCEDURES, BANK ACCOUNTS, AND CERTAIN  
PAYMENT METHODS; (II) PROHIBITING SETOFFS AND FREEZING OF BANK  
ACCOUNTS; (III) MODIFYING REQUIREMENTS OF SECTION 345(b) OF THE  
BANKRUPTCY CODE; AND (IV) FOR RELATED RELIEF**

**PLEASE TAKE NOTICE** that, on June 30, 2022, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Motion of the Debtors for Entry of Interim and Final Orders: (I) Authorizing Use of Cash Management Procedures, Bank Accounts, and Certain Payment Methods; (II) Prohibiting Setoffs and Freezing of Bank Accounts; (III) Modifying Requirements of Section 345(b) of the Bankruptcy Code; and (VI) Related Relief* [Docket No. 5] (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that, on July 1, 2022, the Bankruptcy Court entered the *Order Granting, on an Interim Basis, Motion of the Debtors for Entry of Interim and Final Orders: (I) Authorizing Use of Cash Management Procedures, Bank Accounts, and Certain Payment Methods; (II) Prohibiting Setoffs and Freezing of Bank Accounts; (III) Modifying*

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors’ mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

*Requirements of Section 345(b) of the Bankruptcy Code; and (IV) for Related Relief* [Docket No. 61] (the “Interim Order”).

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider approval of the Motion on a final basis is scheduled for August 2, 2022 at 10:00 a.m. (Eastern Time) (the “Hearing”).

**PLEASE TAKE FURTHER NOTICE** that a revised proposed form of order granting the Motion on a final basis (the “Proposed Final Order”) is attached hereto as **Exhibit A**.

**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit B** is a comparison of the Proposed Final Order to the Interim Order.

**PLEASE TAKE FURTHER NOTICE** that the Debtors reserve the right to modify the Proposed Final Order prior to the Hearing.

Dated: August 1, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

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